

STPR

AHLERS, COONEY, DORWEILER, HAYNIE, SMITH & ALLBEE, P.C. *Don Linger*

ATTORNEYS AT LAW

100 COURT AVENUE SUITE 600
DES MOINES, IOWA 50309-2231
FAX 515 243 2149
515 243 7611

PHILIP J. DORWEILER
KENNETH H. HAYNIE
H. RICHARD SMITH
ROBERT G. ALLBEE
JOHN F. MCKINNEY, JR.
L. W. ROSEBROOK
RICHARD G. SANTI
EDGAR H. BITTLE
RONALD L. SUTPHIN
TERRY L. MONSON
LANCE A. COPPOCK

DAVID H. LUGINBILL
MARK W. BEERMAN
EDWARD W. REMSBURG
RANDALL H. STEFANI
ELIZABETH GREGG KENNEDY
WADE R. HAUSER III
WILLIAM J. NOTH
DAVID SWINTON
LINDA L. KNIEP
PETER PASHLER
IVAN T. WEBBER

JANE B. MCALLISTER
R. MARK CORY
STEVEN K. GAER
SERGE H. GARRISON
RONALD L. PEELER
ANDREW J. BRACKEN
STEVEN L. SERCK
JEFFREY M. LAMBERTI
MICHAEL J. EASON
CAROLE A. TILLOTSON
GARTH D. ADAMS

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STEVEN M. NADEL
SADATH A. SAYEED
MERLE WILNA FLEMING
JUL 26 1994

STPG SECTION

PAUL F. AHLERS
JAMES EVANS COONEY

July 20, 1994

Lyndell L. Harrington, P.E.
Chief, RCRA Branch
Waste Management Division
United States Environmental
Protection Agency
Region VII, 726 Minnesota Avenue
Kansas City, KS 66101

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JUL 22 1994

PRMT-SECTION

RE: RCRA Storage Permit

Dear Mr. Harrington:

In response to your letter dated June 27, 1994, enclosed please find an explanation of the management procedures for the fluorescent lamp recycling facility I first addressed in my letter of April 28, 1994. As requested, I have outlined the operating procedures used for the lamps prior to processing, including where and how the spent fluorescent lamps are managed. Also enclosed is a facilities plan for this process.

Upon review of the enclosed, I am hopeful that you will conclude that this management, which is totally contained in a building, is appropriate when the bulbs are held for less than twenty-four hours and should not require a RCRA storage permit. I welcome your views on this issue.

Very truly yours,

AHLERS, COONEY, DORWEILER,
HAYNIE, SMITH & ALLBEE, P.C.

By:

Jane B. McAllister
Jane B. McAllister

JBM/kfb
cc (w/encl.): Baerbel E. Schiller
cjbmmisharring.letkfb



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LAMP MANAGEMENT PROCEDURES

1. Lamps are unloaded at the recycling facility * and carefully placed on specially designed "carts" with the accompanying bill of lading. The date/time of unloading at the recycling facility is recorded on the bill of lading. (The carts used to move lamps within the recycling facility are steel and designed with stake sides for ease in loading yet hold lamps securely in place.
2. The lamps are moved on carts to the recycling "staging area" to await processing. The staging area is indoors on a concrete floor near the lamp processing equipment. The staging area is located away from shipping/receiving and forklift traffic to prevent accidental lamp breakage. Lamps in the staging area are checked regularly for breakage.**
3. Lamps are processing and counted to insure no loss occurred during temporary storage in the staging area) and the date/time when processing is completed is recorded on the bill of lading. (Lamps are processed within a matter of hours of receipt at the recycling facility and always in less than twenty-four (24) hours).

* The lamps are transported/moved in DOT approved shipping containers and remain in these containers until processing to prevent lamp breakage.

** In the event that lamp breakage occurs in the "staging area" (or other areas) A-TEC Recycling Inc.'s mercury spill contingency plan would go into effect.

